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*Attorneys for the Motors Liquidation Company
GUC Trust Administrator*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	: Chapter 11 Case No.
	:
	:
MOTORS LIQUIDATION COMPANY, <i>et al.</i>,	: 09-50026 (MG)
f/k/a General Motors Corp., <i>et al.</i>	:
	: (Jointly Administered)
	:
Debtors.	:
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CERTIFICATE OF NO OBJECTION

Pursuant to 28 U.S.C. § 1746, Local Bankruptcy Rule 9075-2 and the *Sixth Amended Order Pursuant to 11 U.S.C. § 105(a) and Fed. R. Bankr. P. 1015(c) and 9007 Establishing Notice and Case Management Procedures* dated May 5, 2011 [ECF No. 10183] (the “**Sixth Amended Case Management Order**”), the undersigned hereby certifies as follows:

1. On March 2, 2021, Wilmington Trust Company, not in its individual capacity and solely in its capacity as trust administrator and trustee of the Motors Liquidation Company GUC Trust (in such capacity, the “**GUC Trust Administrator**”), filed *The GUC Trust Administrator’s Motion for an Order and Final Decree Pursuant to Bankruptcy Code Section 350, Bankruptcy Rule 3022 and Local Rule 3022-1 (I) Closing the Chapter 11 Case, (II) Authorizing the Wind-Down and Dissolution of the GUC Trust, and (III) Granting Related Relief* [ECF No. 14784] (the “**Motion**”).

2. On March 2, 2021, the GUC Trust Administrator (through its agent, Epiq Class Action and Claims Solutions, Inc.) served notice of the Motion on (a) the Office of the United States Trustee for the Southern District of New York, U.S. Federal Office Building, 201 Varick Street, Room 1006, New York, New York 10014, (b) the parties in interest in accordance with the Sixth Amended Case Management Order, and (c) the parties required to be served under Section 6.1(b)(iv) of the Motors Liquidation Company GUC Trust Agreement. *See* ECF No. 14789.

3. The deadline for submitting objections to the Motion, as set forth in the Motion, was March 9, 2021 at 4:00 p.m. (Eastern Time) (the “**Objection Deadline**”).

4. The undersigned counsel represents that (i) more than forty-eight (48) hours has passed since the expiration of the Objection Deadline, (ii) it has reviewed the Court’s docket not less than forty-eight (48) hours after the expiration of the Objection Deadline, (iii) no objections, responsive pleadings or requests for hearing appear on the Court’s docket, and (iv) no objections, responsive pleadings or requests for a hearing have been filed or served on the GUC Trust Administrator with respect to the Motion.

5. While no formal or informal objections to the Motion were filed or served upon the GUC Trust Administrator prior to the Objection Deadline, the undersigned counsel did receive a requested revision to the proposed *Order and Final Decree Pursuant to Bankruptcy Code Section 350, Bankruptcy Rule 3022 and Local Rule 3022-1 (I) Closing the Chapter 11 Case, (II) Authorizing the Wind-Down and Dissolution of the GUC Trust, and (III) Granting Related Relief* (the “**Proposed Order**”) from General Motors LLC (“**New GM**”). The GUC Trust Administrator has agreed to incorporate the requested revision into the Proposed Order. Attached as **Exhibit A** hereto is a redline comparing the

Proposed Order as annexed to the Motion filed on March 2, 2021, and revised Proposed Order incorporating New GM's revision.

6. An electronic copy of the revised Proposed Order will be submitted to the Court, along with this Certificate of No Objection pursuant to Local Bankruptcy Rule 9075-2 and the Sixth Amended Case Management Order.

Dated: New York, New York
March 11, 2021

McDERMOTT WILL & EMERY LLP

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